

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

ANGELA RUSSELL, as Administratrix  
of the Estate of Jeremy T. Russell, and  
on Behalf of the Wrongful Death  
Beneficiaries of Jeremy T. Russell

PLAINTIFF

v.

CIVIL ACTION NO. 3:22-CV-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION;  
JOHN AND JANE DOE CORRECTIONAL OFFICERS;  
VITALCORE HEALTH STRATEGIES, LLC; EVELYN  
DUNN; STACEY KITCHES; WILLIAM BRAZIER; and  
JOHN AND JANE DOE MEDICAL PROVIDERS

DEFENDANTS

**AFFIDAVIT OF DONALD JACKSON**

STATE OF MISSISSIPPI  
COUNTY OF LAUDERDALE

Before me, the undersigned authority, personally appeared Donald Jackson, who  
being by me first duly sworn, did depose and declare under oath as follows:

1. My name is Donald Jackson. I am over the age of twenty-one years and a  
resident of Lauderdale County, Mississippi. I have personal knowledge of the facts in  
this Affidavit.

2. I am employed with Management & Training Corporation ("MTC") in the  
position of Warden at East Mississippi Correctional Facility ("EMCF"). I provide this  
affidavit solely in my professional capacity.

3. Pursuant to my employment with the MTC, I am familiar with the  
contracts governing MTC's operation of the EMCF. I am further familiar with the roles,

responsibilities, duties, and obligations of MTC under these contracts with respect to EMCF.

4. MTC's roles, responsibilities, duties and obligations at EMCF are clearly delineated and set forth in the contracts governing MTC's operation of EMCF. Such contracts do not delegate any responsibility for medical, mental health, pharmaceutical or similar healthcare services at EMCF to MTC.

5. The contracts governing MTC's operation of EMCF do not require or allow MTC to (i) provide medical or mental health services at EMCF, (ii) employ or contract with any physicians, nurses, health services administrators, or other trained medical or mental health professionals at EMCF, (iii) fund any medical or mental health services at EMCF, or (iv) control, employ, train, supervise, direct or otherwise have any authority over VitalCore and/or its employees.

6. In that regard, MTC does not employ or contract with any physicians, nurses, health services administrators, or other trained medical or mental health professionals providing medical or mental health services to inmates at EMCF.

7. MTC and its personnel have no involvement in making medical or mental health diagnoses, deciding the course of medical or mental health treatment, placing inmates on or discharging inmates from suicide watch, prescribing medication or other forms of treatment, or rendering medical or mental health treatment for inmates housed at EMCF.

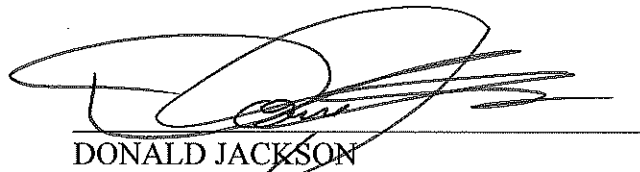
8. MTC does not fund any medical or mental health treatments provided to inmates at EMCF.

9. MTC does not control, employ, train, supervise, direct or otherwise have authority over VitalCore and/or its employees with respect to the provision of medical and mental health services to inmates at EMCF.

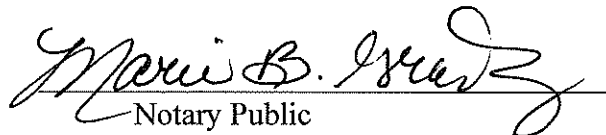
10. MTC does not require or expect VitalCore to follow any MTC company policies or procedures with respect to the provision of medical or mental health services to the inmates at EMCF.

FURTHER AFFIANT SAITH NOT.

DATED this 10<sup>th</sup> day of August, 2023.

  
DONALD JACKSON

SWORN TO and subscribed before me this the 10<sup>th</sup> day August, 2023.

  
Notary Public

My Commission Expires: September 24, 2024

